## REMARKS

This request for reconsideration is submitted in response to the Office Action dated March 12, 2007 (hereinafter "the Office Action"). Claims 1-10 and 18-19 remain pending in the present application. Reconsideration and allowance is respectfully requested in view of the remarks provided below.

### 1. The Rejection under 35 U.S.C. § 102(b)

Claims 1-10 and 18-19 have been rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 5,909,545 to Frese (hereinafter "Frese"). This rejection is traversed and reconsideration is requested for the reasons which follow. The Examiner is reminded that this same objection was raised in the Office Action dated July 22, 2005, and was overcome by applicant's amendment and response filed on November 25, 2005.

The present invention relates to a server-based computing system, including at least one server (1) and at least one client computer (5), connected to the server (1) through a network (2). The server (1) includes means for providing the client computer (5) with a user interface and means for running the application. The system also includes means for controlling the locally run applications through the user interface provided by the server (1), and is configured to enable the server (1) to control the display on a screen of the display device (7) of a screen area having contents generated locally on the client computer.

The Examiner takes the position that Frese meets the limitation of claim 1 of the present application requiring "the client computer…is configured to enable the server…to control the display on a screen of the display device of a screen area having contents generated locally on the client computer." The applicant disagrees with this conclusion of the Examiner.

More specifically, the Examiner states that to meet this limitation, Frese's client computer (16) needs to be capable of enabling the server (20) to control the display on a screen of the display device of a screen area having contents generated locally on a client computer (16). The Examiner then concludes that the fact that Frese's client computer (16) is connected to the server (20) via a network is sufficient to make the Frese capable of enabling the server (20) to control the display on a screen of the display device of a screen area having contents generated locally on the client computer (16). However, merely connecting a client computer (16) to a server (20) is not enough to enable the server (20) to control the display on a screen of the display device of a screen area having contents generated locally on the client computer (16), as the Examiner suggests.

Specifically, the server must be provided with means for controlling the display of the local client computer. See page 11, lines 3-6 of the specification. Without such means provided in the server, the system of Frese is not capable of controlling the display on a screen of the display device of a screen area having contents generated locally on the client computer (16). Instead, Frese discloses an applet (remote display module (RDM) 18) running on a client. See col. 9, line 63 to col. 10, line 4. The HTML page referred to in the Office Action, described at col. 7, lines 33-35 of Frese, is not an application that is run locally. It is only provided for describing "available application programs". See col. 7, lines 33-35. The other modules running on the server do not specify the display properties of an interface to an application running locally on the client. Frese discloses that an AIM (application interception module) converts the I/O streams for the application launched on the RAS (remote application server) into remote control protocol messages, see col. 13, lines 60-63, and that a protocol translation and optimisation module (PTOM) encapsulates known remote control protocol messages in the remote control protocol recognized by the Remote Display Module. See col. 8, lines 46-48. Therefore, the AIM, PTOM and RDM each play a role in controlling applications running on the server, but do not control the display of a user interface through which an application running locally on the client computer can be controlled. For these reasons the limitations of claim 1 are not met by Frese.

The Examiner also takes the position that, "Frese teaches a server (20) that controls the display on a screen of the display device of a screen area (specifies RDM applet 18's parameters) having contents generated locally (RDM applet's display) on the client computer." There are inaccuracies in this statement:

1. the RDM applet 18 controls the display of a screen area not the server (see col. 6, lines 60-64 of Frese).

2. RDM executes on the user system 16 (see col. 6, lines 61-62 of Frese) and thus the user system 16 controls the display by executing the RDM.

3. Frese does not appear to disclose that the server specifies RDM applet 18's parameters, as the Examiner suggests. Rather, the executable code for the RDM applet 18 is transported in a file across the network prior to execution on the user system 16 (see col. 9, lines 61-66 of Frese).

4. The RDM applet 18 does not generate content. Rather, the RDM applet controls a display and receives user input actions to generate and provide output to a local resource interface 32. See col. 9, line 66 to col. 10, line 4 of Frese. Thus, there is no teaching in Frese that the RDM applet 18

generates content or is even capable of generating content. Rather, RDM applet 18 merely receives input and provides output to a local resource interface 32.

5. Even if RDM applet 18 displays content generated locally (e.g. user input to RDM applet 18), this process does not involve the server 20 and thus the display of the locally generated content is not controlled by the server 20 as required by the present claims.

Accordingly, Frese does not meet all of the limitations of claim 1 of the present application. Accordingly, withdrawal of the rejection under 35 U.S.C. §102(b) is requested.

With respect to claim 18, the Examiner relied on the language of claim 18 stating that "the computer program...allows the server to control the display on a screen of the display device..." Claim 18 has been amended to require that the server controls the display on a screen of the display device. Accordingly, for the reasons discussed above with respect to claim 1, claim 18 is novel over Frese since Frese does not disclose that the server 20 controls the display, but rather Frese discloses that the RDM applet 18 executed on the client computer 16 controls the display. See col. 6, lines 61-64 of Frese. Withdrawal of the rejection and allowance of claim 18 is requested.

Frese does not meet the limitations of claim 19 since Frese does not disclose a computer program that, when run on the computer, causes the computer to accept a user interface for controlling the locally run applications, provided by the server and to display a screen area having contents generated locally on the client computer according to display properties specified by the server. The Examiner alleges that a web page is the user interface of Frese. This is incorrect. The browser 30 generated by the RDM applet 18 of Frese is the user interface and the web page is the content displayed by the user interface. See col. 7 lines 16-27 of Frese. Accordingly, the user interface of Frese (browser 30) is not controlled or provided by the server 20, but rather is controlled and provided by the local computer 16 via RDM applet 18. Thus, Frese does not disclose the requirement of claim 19 that the display properties of the interface are specified by the server 20 since the display properties are specified by execution of RDM applet 18 on the client computer 16. See col. 6, lines 61-64 of Frese.

The Examiner also takes the position that the display properties of Frese are the applet parameters specified in an applet tag and that these display properties of Frese are specified by the server 20. However, this is not the case. Frese teaches that the applet parameters and applet tags are generated by the browser 30. See col. 7, lines 41-62 of Frese. The browser 30 of Frese runs on the local user system 16, not on the server 20. See col. 7, lines 1-5 of Frese. Thus, the local computer 16 of Frese actually specifies the display properties of the applet parameters of the applet tags.

For these reasons claim 19 is in condition for allowance. Favorable consideration and withdrawal of the rejection of claim 19 is requested.

Claims 1-10 and 18-19 have been rejected under 35 U.S.C. 103(a) as being anticipated by U.S. Patent No. 5,613,090 to Willems (hereinafter "Willems"). This rejection is traversed and reconsideration is requested for the reasons which follow.

Willems discloses a personal computer in a computer network which is capable of seamlessly running disparate graphical user interfaces (GUIs) without requiring extraneous system resources. See col. 1, lines 9-13 of Willems. In particular, Willems discloses running Microsoft Windows® and X-Windows® applications simultaneously. Willems discloses the provision of a consistent and uniform user interface when a client runs applications under two different operating systems with the Microsoft Windows® application running locally and the X-Windows® application running on a server.

The Examiner admits that the embodiment of Fig. 8 of Willems does not disclose:

(1) controlling locally run applications through the user interface provided by the server (See p. 8, lines 7-8 of the Office Action), and

(2) means for locally running at least one application (See p. 8, line 3 of the Office Action).

Thus, at least two elements of claim 1 are admitted to be missing from the prior art embodiment of Fig. 8 of Willems.

The Examiner takes the position that it would be obvious to modify the embodiment of Fig. 8, wherein the X Windows window manager 100 is run remotely on the server, to enable the X Windows window manager 100 to control locally run applications in view of the discussion of Willems in regard to Fig. 9. The problem with this proposed modification of the embodiment of Fig. 8 is the same problem that led to the withdrawal of the previous rejection over Willems, namely, that such a modification will increase network traffic since the window manager 100 of Fig. 8 running on the server will have to send commands over the network in order to control locally run applications through the user interface. Accordingly, this modification would directly contradict the primary stated goal of Willems which is to reduce network traffic since this arrangement would again increase network traffic. See col. 13, line 67 to col. 14, line 4 of Willems and the Field of the Invention at col. 1, lines 9-13 of Willems, which states that, "The present invention is related to... a personal computer network which is capable of seamlessly running disparate GUIs [graphical user interfaces] and their applications without requiring extraneous system resources." (emphasis added).

The Examiner also alleges that it would be obvious in the embodiment of Fig. 8 of Willems to provide means on the client computer for locally running at least one further application. The applicant

also disagrees with this since this would also increase network traffic because, in the system proposed by the Examiner, control of this locally run application through the user interface would again require the server to send commands over the network since in the Examiner's configuration, the user interface is run remotely on the server. As a result, in this configuration, the skilled person, desiring to reduce network traffic in accordance with the teachings of Willems, would not provide additional means on the client computer to run additional applications since this would further increase network traffic. Rather, the skilled person would locate such means on the server so that communication between the user interface and the server running the application would not result in an increase in network traffic.

The Examiner also concludes that Willems is configured to enable the server to control the display on a screen of the display device because Willems' client computer is connected to the server via a network. However, merely connecting a client computer to a server is not enough to enable the server to control the display on a screen of the display device of a screen area having contents generated locally on the client computer, as the Examiner suggests. Specifically, the server must be provided with means for controlling the display of the local client computer. See page 11, lines 3-6 of the specification. Without such means provided in the server, the system of Willems is not capable of controlling the display on a screen of the display device of a screen area having contents generated locally on the client computer. Such means could be, for example, X Windows windows manager 100, as disclosed in Willems. However, for the reasons given above, the skilled person reading Willems would not locate the windows manager 100 on the server, as would be required to meet the present claims, since this would result in an undesirable increase in network traffic.

Finally, and most importantly, although Willems indicates that the window manager 100 of prior art Figure 8 can be run remotely (col. 13, lines 40-58 of Willems), prior art Figure 8 of Willems shows the Window manager 100 and the X server 102 as two separate elements. Moreover, Willems states that running the window manager 100 remotely increases network traffic between Window manager 100 and the X server 102 (col. 13, lines 53-58 of Willems). Thus, it is clear that even when window manager 100 is run remotely, the Window manager 100 of Willems is <u>not</u> run on the X server 102. Thus, even in the embodiment of Fig. 8 of Willems, the user interface is not being run by the server (X server 102), but instead is being run by the window manager 100, which is connected to the X server via the network. Accordingly, Willems completely lacks any teaching, even in the prior art embodiment of Fig. 8, to configure the server to run the user interface, as is required by the present claim 1.

Claims 2-10 depend from claim 1 and thus the same arguments apply to these claims. Favorable consideration and withdrawal of the rejection of claims 1-10 over Willems under 35 U.S.C. §103(a) is requested.

With respect to the rejection of claim 18 over Willems under 35 U.S.C. §103(a), for the same reasons given above with respect to claim 1, the embodiment of Fig. 8 of Willems does not teach or suggest the following requirements of claim 18:

(1) controlling locally run applications through the user interface provided by the server (See p. 11, lines 5-6 of the Office Action), and

(2) means for locally running at least one application (See p. 11, lines 1-2 of the Office Action).

As discussed above, the skilled person would not modify the embodiment of Fig. 8 of Willems, with the window manager 100 run remotely, to include either of these two missing features since such modifications would increase network traffic, thereby directly contradicting the stated goal of Willems to decrease network traffic. See col. 13, line 67 to col. 14, line 4 of Willems and the Field of the Invention at col. 1, lines 9-13 of Willems, which states that, "The present invention is related to... a personal computer network which is capable of seamlessly running disparate GUIs [graphical user interfaces] and their applications without requiring extraneous system resources." (emphasis added).

As discussed above in relation to the rejection of claim 18 over Frese, claim 18, as amended, requires the server to control the display on a screen of the client computer. The Examiner takes the position that the embodiment of Fig. 8 of Willems teaches this element of claim 18 on the basis that window manager 100, when run remotely, meets this limitation. However, as discussed above, Fig. 8 of Willems and the description thereof make it clear that even when window manager 100 is run remotely, it is not run on X server 102 of Willems, but rather is connected to X server 102 of Willems via the network. Accordingly, even when window manager 100 of Willems is run remotely, it is not run by the server and thus the server of Willems still does not control the display on the client computer.

For these reasons, withdrawal of the rejection of claim 18 over Willems under 35 U.S.C. §103(a) is requested.

With respect to the rejection of claim 19 over Willems under 35 U.S.C. §103(a), for the same reasons given above with respect to claim 1, the embodiment of Fig. 8 of Willems does not teach or suggest the following requirements of claim 19:

(1) controlling locally run applications through the user interface provided by the server (See p. 12, lines 16-17 of the Office Action), and

(2) means for locally running at least one application (See p. 12, lines 12-13 of the Office Action).

As discussed above, the skilled person would not modify the embodiment of Fig. 8 of Willems, with the window manager 100 run remotely, to include either of these two missing features since such modifications would increase network traffic, thereby directly contradicting the stated goal of Willems to decrease network traffic. See col. 13, line 67 to col. 14, line 4 of Willems and the Field of the Invention at col. 1, lines 9-13 of Willems, which states that, "The present invention is related to... a personal computer network which is capable of seamlessly running disparate GUIs [graphical user interfaces] and their applications without requiring extraneous system resources." (emphasis added).

In addition, the Examiner admits that Willems also lacks a third element of claim 19, namely,

(3) that the computer program, when run on the computer, causes the computer to display a screen area having contents generated locally on the client computer according to display properties specified by the server . (emphasis added).

As discussed above, nowhere does Willems teach that the windows manager 100 should be located on the server. Thus, Willems does not teach that the display on the client computer is generated according to display properties specified by the server since the server of Willems. It is noted that the Examiner has nowhere alleged in the Office Action that Willems teaches this feature of claim 19.

For these reasons, withdrawal of the rejection of claim 18 over Willems under 35 U.S.C. §103(a) is requested.

The Applicant considers that this application is in condition for allowance. If the Examiner feels that a telephone interview would expedite prosecution of this patent application, he is respectfully invited to telephone the undersigned at 215-599-0600.

Respectfully submitted,

Date: June 8, 2007

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